

Hoch Affidavit (USDC)

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
LARRY PIONE,)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 04-12177-MLW
)	
THE MASSACHUSETTS PORT)	
AUTHORITY,)	
)	
Defendant.)	
_____)	

AFFIDAVIT OF WILLIAM V. HOCH IN SUPPORT OF
DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

I, William V. Hoch, do hereby depose and state as follows:

1. I am employed as Senior Employment Counsel by the Massachusetts Port Authority. I have held this position since May of 2004.
2. Attached to this Affidavit as Exhibit A, you will find a true and accurate copy of selected pages from the deposition of Larry Pione dated March 6, 2006.
3. Attached to this Affidavit as Exhibit B are true and accurate reproductions of selected exhibits from the deposition of Larry Pione. Specifically, attached hereto as Exhibit B are deposition exhibits 5 (documents related to settlement of Department of Industrial Accidents matter), 6 (documents related to Employee's claim at the Department of Industrial Accidents), 7 (Plaintiff's FMLA Certification Form dated 11-13-01), 8 (Massport's Policy on Employment Terms and Conditions), 9 (documents related to Plaintiff's Long-Term Disability Claim), 12 (Medical Report from Bruce Freeman, L.I.C.S.W. dated 11/6/01).

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4. Attached to this Affidavit as Exhibit C is a true and accurate copy of the Dismissal and Notification of Rights issued to Plaintiff from the Massachusetts Commission Against Discrimination dated May 27, 2005, and the accompanying Recommendation For Dismissal of the Complaint.

SIGNED THIS 9th DAY OF JUNE 2006, UNDER THE PENALTIES OF PERJURY.

/s/ William V. Hoch

William V. Hoch

CERTIFICATE OF SERVICE

I hereby certify that this document has been filed through the ECF system and I understand that it will be sent electronically by the ECF system to the registered participants as identified on the Notice of Electronic Filing (NEF) and I will ensure that paper copies are sent to those indicated as non-registered participants on June 9, 2006.

/s/ William V. Hoch

William V. Hoch